

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Ocean Semiconductor LLC

Plaintiff,

v.

Infineon Technologies AG and Infineon  
Technologies Americas Corp.,

Defendants.

Civil Action No. 1:20-cv-12311-PBS

**DEFENDANTS' MOTION TO STAY PENDING *INTER PARTES* REVIEW**

Defendants Infineon Technologies AG and Infineon Technologies Americas Corp. hereby respectfully move to stay this proceeding pending *inter partes* review of the eight patents-in-suit.

As set forth in more detail in the memorandum of law submitted with this motion, there are currently petitions for *inter partes* review pending before the PTAB for each of the eight patents asserted in this case. Given the very early stage of this case, the significant likelihood that the IPR process will substantially simplify the case, and the absence of any undue prejudice to Ocean Semiconductor LLC, Defendants respectfully request that the Court GRANT this Motion and STAY these proceedings pending completion of the *inter partes* review process.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Defendants Infineon Technologies AG and Infineon Technologies Americas Corp. believe that oral argument may assist the Court and request an oral hearing to address this motion.

Respectfully submitted,

Date: August 27, 2021

/s/ Gregory F. Corbett

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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Gregory F. Corbett, counsel for Defendants Infineon Technologies AG and Infineon Technologies Americas Corp., hereby certify that we have conferred with counsel for Ocean Semiconductor LLC to resolve or narrow the issues presented in this motion but, after good faith attempt, the parties reached no agreement.

Dated: August 27, 2021

/s/ Gregory F. Corbett  
Gregory F. Corbett

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Dated: August 27, 2021

/s/ Gregory F. Corbett  
Gregory F. Corbett